

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 02-61191-CIV-HUCK

MERRILL LYNCH BUSINESS FINANCIAL
SERVICES, INC.

Plaintiff,

vs.

FRANK L. AMODEO AND JAMES
SADRIANNA,

Defendants.

FRANK L. AMODEO

Counterclaim Plaintiff

Vs.

MERRILL LYNCH BUSINESS FINANCIAL
SERVICES, INC.

Counterclaim Defendant

FRANK L. AMODEO

Third Party Plaintiff

Vs.

C. LEO SMITH, GEORGE SARAFIANOS, MICHAEL D'ANGELO,
STEVEN CINNANTE AND PAUL CINNANTE

Third Party Defendants

FRANK L. AMODEO

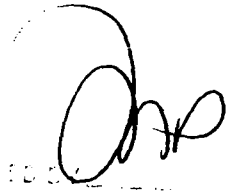
Crossclaim Plaintiff

Vs.

SIGNATURE GRAPHICS, INC.

Crossclaim Defendant

Motion For Summary Judgment


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CLARENCE MADDOX
CLERK U. S. DIST. CT.
S.D. OF FLA - MIA



MOTION FOR SUMMARY JUDGMENT

Comes Now Frank L. Amodeo ("Amodeo") and files this Amodeo's Motion for Summary Judgment showing the Court in support of said motion:

1.

On August 22, 2002 Merrill Lynch filed a complaint against Frank L. Amodeo and James Sadrianna.

2.

After a multitude of preliminary motions and discovery, Merrill Lynch amended the original complaint on April 9, 2003 (hereinafter referred to as the "Complaint").

3.

This motion addresses Count I of the Complaint.

4.

This Count alleges Amodeo is the alter-ego of Signature Graphics, Inc., thus imputing to Amodeo the actions of Signature Graphics, Inc.

5.

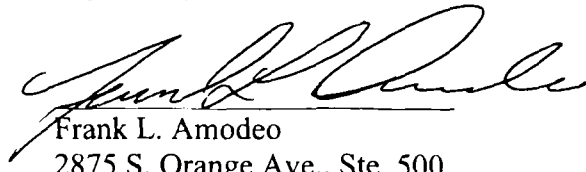
As set forth in the brief and affidavit filed in support of this motion, no genuine issues of fact are in controversy which are material to this count.

6.

Judgment should be granted in favor of Amodeo pursuant to Rule 56.

Wherefore Amodeo respectfully requests the Court grant judgment in Amodeo's favor on Count I of the Complaint; alternatively dismiss the Complaint with prejudice and such other further relief as the Court deems appropriate, fair or equitable.

Respectfully submitted,



Frank L. Amodio
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I certify the foregoing notice as been sent by first class mail this 12th day of July, 2003 to:

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Frank L. Amodio